IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

)	Chapter 11
In re:)	
)	Case No. 20-20182 (DRJ)
J.C. PENNEY COMPANY, INC., et al., 1)	
)	(Jointly Administered)
Debtors.)	
)	Relates to Docket No. 1929

WITHDRAWAL OF OBJECTION TO (A) NOTICE OF POTENTIAL ASSUMPTION AND ASSIGNMENT OF EXECUTORY CONTRACTS OR UNEXPIRED LEASES AND CURE COSTS AND (B) NOTICE OF OPCO ASSIGNED CONTRACTS LIST AND PROPCO ASSIGNED CONTRACTS LIST

Carmen Spinoso, President/CEO of Spinoso Real Estate Group, solely in his capacity as court appointed receiver pursuant to that certain order appointing receiver entered on June 17, 2019 in the Supreme Court of Broome County, New York, successor-in-interest to Oakdale Mall II, L.L.C. (successor in interest to Interstate Properties), by and through his undersigned counsel, hereby withdraws his *Objection to (A) Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Costs and (B) Notice of Opco Assigned Contracts List and Propose Assigned Contracts List* [Docket No. 1929].

Dated: February 25, 2021 Respectfully submitted,

By: /s/ John D. Penn

John D. Penn State Bar No. 15752300 S.D. Texas I.D. No. 10782 PERKINS COIE LLP 500 North Akard Street, Suite 3300 Dallas, Texas 75201

Telephone: (214) 965-7734 JPenn@perkinscoie.com

A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of Debtors' claims and noticing agent at http://cases.primeclerk.com/JCPenney. The location of Debtor J.C. Penney Company, Inc.'s principal place of business and Debtors' service address in these chapter 11 cases is 6501 Legacy Drive, Plano, Texas 75024.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on February 25, 2021, a true and correct copy of the foregoing document was served via the Court's Electronic Case Filing (ECF) system on all parties registered to receive electronic notices in these cases.

/s/ John D. Penn

John D. Penn